



The Commonwealth of Massachusetts
Executive Office of Environmental Affairs

Department of Environmental Protection

Bureau of Waste Site Cleanup

One Winter Street, Boston, Massachusetts 02108

Daniel S. Greenbaum
Commissioner

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NOV 15 90

Superfund Records Center
SITE: Iron Horse
FILE NO: 3.1
OTHER: 209731

Roger P. Thibault
GZA Inc.
320 Needham Street
Newton Upper Falls, MA 02164

November 6, 1990

RE: BNZ Materials, Inc.

Dear Mr. Thibault:

The DEP's Bureau of Waste Site Clean-up has reviewed your proposal dated July 12, 1990 regarding trench excavation at BNZ Materials Inc. (BNZ) in North Billerica. Please note that GZA's July proposal was received by this office on November 1, 1990. As you are aware, BNZ is considered part of the Iron Horse Park Federal Superfund site; therefore all decisions regarding any construction activities which may impact the future remediation activities at BNZ must be subject to review by the DEP and the EPA.

This office agrees with your proposed plan outlined in your July 1990 letter to 1) excavate the top 6 inches of soil and stockpile it separately from other excavated material, 2) collect and analyze for asbestos additional samples from the excavated area, and if asbestos is detected above background levels, additional soil will be excavated and stockpiled, 3) replace the topsoil in its original location.

The Bureau approves your proposal providing the following additional concerns are addressed:

- 1) "Background" should be defined and not left to interpretation.
- 2) All regraded areas should be appropriately seeded to provide for a vegetative cover for backfilled soils containing asbestos material.
- 3) The proposal should clearly state the disposal option for any additional soils from areas greater than 6 inches which are found to contain asbestos, i.e. is it GZA's intention to backfill all soils found to contain asbestos??




The Bureau has discussed GZA's proposal with the EPA project manager for the Iron Horse Park Federal Superfund site. At this time, both agencies agree with the proposal to allow the backfilling of soils containing asbestos. The approval is being given with the understanding that future information collected and evaluated during the EPA's remedial investigation and feasibility study for the Iron Horse Park site may result in a selected remedial action which will address soils containing asbestos materials. Therefore, the selected remedy for the Federal Superfund site may include remediation of the backfilled soils containing asbestos.

The Bureau has also discussed your proposal with the DEP's Division of Air Quality (DAQC) and is of the understanding that a letter will also be issued by the DAQC listing certain additional conditions to be followed during the trench excavation.

If you have any questions, please feel free to contact me at 617-292-5785.

Very truly yours,


Dale C. Young
Project Manager

cc John MacAuly, DEP-DAQC
Marcia Sherman, DEP-WPC
Don McElroy, EPA
Denise Bordanaro, Hale and Dorr